

THE HONORABLE BENJAMIN H. SETTLE

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT TACOMA

MADELEINE GARZA, an individual,)	Case No. 3:18-CV-05106-BHS
)	
Plaintiff,)	DECLARATION OF ANDREW G.
)	YATES IN SUPPORT OF
v.)	DEFENDANT NATIONAL
)	RAILROAD PASSENGER
NATIONAL RAILROAD PASSENGER)	CORPORATION'S MOTION TO
CORPORATION d/b/a AMTRAK,)	STRIKE DR. RICHARD E.
)	SEROUSSI'S SUPPLEMENTARY
Defendant.)	EXPERT REPORT AND TO
)	PRECLUDE TESTIMONY
)	REGARDING PLAINTIFF'S
)	OBSTETRICS ISSUES OR FEARS

I, Andrew G. Yates, declare the following to be true:

1. I am one of the attorneys for defendant National Railroad Passenger Corporation ("Amtrak") in the above captioned matter. I am of legal age, am competent to testify, and make this declaration from my own personal knowledge.

2. Plaintiff's medical expert, Dr. Richard E. Seroussi, completed an initial expert report dated April 19, 2018. Attached as Exhibit A is a true and correct copy of that expert report.

3. More than a year later, Dr. Seroussi completed a supplementary expert report dated May 3, 2019. Attached as Exhibit B is a true and correct copy of that supplementary expert report.

CERTIFICATE OF SERVICE

I hereby certify under penalty of perjury of the laws of the State of Washington that on the date listed below, I caused to be served a copy of the attached document to the following person(s) in the manner indicated below at the following address(es):

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Executed this 18th day of October, 2019, at Seattle, Washington.

s/ Alisa R. Flabel

Alisa R. Flabel, Legal Assistant